

Robert L. Sillett
6823 Guilford Bridge Dr
Apollo Beach, FL 33572
(813) 313-0056
sillett@gmail.com

May 13, 2019

Federal Communications Commission
Washington, DC

RE: Public Comments on RM-11836

For decades, across multiple administrations and with both Republican and Democratic majorities, the FCC has worked to revitalize the AM broadcast band. The trouble is that every member of the FCC seems to think that to revitalize means to obliterate. Starting with the debacle of AM Stereo in the 1980s to the handling of the 1600 kHz to 1710 kHz expansion band and to the effective killing of clear channel stations, we are yet again at the precipice of another revitalization. The difference is that this time, the FCC is going to finally revitalize AM by going digital!

The time for revitalization of the AM broadcast band has passed, and the proposal to allow the MA3 format on the AM band is folly. After a hundred years, the usefulness of the AM band has been reached. The FCC should focus its efforts on moving to a modern digital transmission format for not just AM but also FM. The trend is obvious. France has shut down all of its mediumwave (AM) transmitters. The United Kingdom too is phasing out AM. Only a month ago, the Japan Commercial Broadcasters Association asked its government to end AM. It is clear that the time for the AM broadcast band has ended. FM too is nearing its end. Norway has eliminated both AM and FM transmissions.

The FCC should rethink broadcast radio as a whole rather than to apply another Band-Aid. It does not take a commission or a study to list the ails of radio in the United States today:

1. The lack of diverse voices (or control by oligopoly). The proliferation of pirate radio across the country is not a scourge of evil-doers. Rather pirate radio is a reaction to the current state of radio where diverse voices cannot be heard. The programming of stations by the oligopoly companies is banal and tasteless. Every market has the same "hot hits" or "young country."
2. There are often 10-20 minutes of commercials per hour with all the stations going to commercial at nearly the same time.

The FCC should think beyond the limited bandwidth allocated to AM and FM radio. Look for a phase-out of all AM and FM transmissions and a replacement with a new digital band based upon open standards that can accommodate scores and scores of stations. Listeners are not concerned about modulation type or frequencies. Today's listeners want excellent sound quality and a choice of diverse programming. Today's listeners are getting this today from streaming services. What does streaming provide that broadcast does not?

1. Diversity. Punk, classical, hard rock, classic country, bluegrass, gospel, rap, hip hop, and hundreds of genres and sub-genres are available. Listeners are not limited to "hot hits" or "young country."
2. Paid streaming options have no commercials. Unpaid streaming options generally have one commercial for every three or four songs. This is far less than that 10-20 minutes of current broadcast stations.

Allowing the MA3 format on the AM band does not address the core issues with broadcasting today. Rather, it exacerbates the problem because the MA3 format takes four times as much bandwidth as an analog AM transmission, thus dramatically cutting the effective number of stations on the AM band.

For nearly one hundred years, AM radio in the United States has been built upon open standards. Phrases such as all-digital and HD are specious. The MA1 and MA3 formats are propriety and do not meet the definition of a standard as they are closed-source.

Should the FCC decide to allow AM stations to proceed with digital transmissions using the MA3 algorithm, it should require DTS to release source code for decoding the formats and ensure that no licensing fees are required to make future receivers. Our AM (and FM) transmissions should not be in the monopolistic hands of a single corporation.

For decades the FCC has attempted to revitalize AM radio (and FM as well) with awful results. Take the opportunity to design broadcast radio for the 21st century. Create a new digital band. Do not patch the 20th century, outdated design.